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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re: GIGA WATT, Inc., a Washington corporation, Debtor.	Case No. 18-03197 FPC 7 The Honorable Frederick P. Corbit Chapter 7
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MARK D. WALDRON, as Chapter 7 Trustee, Plaintiff, vs. PERKINS COIE LLP, a Washington limited liability partnership, <i>et al.</i> , Defendants, - and - THE GIGA WATT PROJECT, a partnership, Nominal Defendant.	Adv. Case No. 20-80031 JOINT STIPULATED MOTION REGARDING CHANGE TO DISCOVERY SCHEDULE ONLY
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Joint Stipulated Motion
Re Discovery Schedule Only - 1

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1 In addition, the Trustee intends to move to compel Perkins to produce
2 documents that Perkins asserts are subject to the attorney-client privilege and to
3 compel Mr. Carlson to produce documents.

4 Based on the foregoing, coupled with the factual complexity of this matter,
5 the parties believe it would be helpful to all concerned to allow additional time for
6 discovery, without affecting the trial date.

7 The parties hereby agree, subject to Court approval, to move the discovery
8 date in the Scheduling Order, ECF 77, as follows:

Deadline	Scheduling Order, ECF 77	Proposed New Scheduling Order
Fact Discovery	March 31, 2022	May 27, 2022
Opening Expert Reports	April 29, 2022	June 29, 2022
Rebuttal expert reports	June 22, 2022	August 22, 2022
Expert Depositions	July 15, 2022	September 7, 2022
Preliminary Witness and Exhibit Lists	September 7, 2022	September 12, 2022

23 Joint Stipulated Motion
24 Re Discovery Schedule Only - 2

Deadline	Scheduling Order, ECF 77	Proposed New Scheduling Order
Proposed Pre-Trial Order	October 3, 2022	October 3, 2022
Exchange Final Witness & Exhibit Lists	October 7, 2022	October 7, 2022
Pre-Trial Conference	October 13, 2022, at 1:30 p.m.	October 13, 2022, at 1:30 p.m.
Trial	November 1, 2022	November 1, 2022
Amend Pleadings or Join Additional Parties, subject to Court approval	November 2, 2022	November 2, 2022

II. RELIEF REQUESTED

For the foregoing reasons, the parties request that the Court grant this stipulated motion to modify and extend the discovery schedule deadlines by 60 days subject to the Court's calendar and availability.

[Signatures follow on the next page.]

Joint Stipulated Motion
Re Discovery Schedule Only - 3

1 Dated this 18th day of February 2022.

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23 Joint Stipulated Motion
24 Re Discovery Schedule Only - 4

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23 Joint Stipulated Motion
24 Re Discovery Schedule Only - 5